

rights is both illusory and insincere.” Defendants have therefore acted or refused to act on grounds that apply generally to the class, so that final injunctive relief or corresponding declaratory relief is appropriate respecting the class as a whole. Fed. R. Civ. P. 23(b)(2).

In addition to certifying the class, Plaintiff requests that the Court enter an order appointing Plaintiff’s counsel as class counsel under Rule 23(g).

Plaintiff further relies on and incorporates the Memorandum of Law in Support of this motion and declarations thereto, filed simultaneously herewith.

WHEREFORE, Plaintiff requests that the Court enter an order (1) certifying a class consisting of all members of the United States Air Force who (a) are subject to a mandate of the Department of Defense or Air Force to receive a COVID-19 vaccine, (b) submitted a request for religious accommodation regarding such mandate based on a sincerely held religious belief, and (c) have received or will receive a final denial of such request from the Department of Defense or Air Force; and (2) appointing Plaintiff’s counsel as class counsel.

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Respectfully submitted,

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